

Hearing Date and Time: April 8, 2015 at 10:00 a.m. (ET)
Objection Deadline: March 30, 2015 at 4:00 p.m. (ET)

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Attorney for the Clients listed on Schedule I

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	
)	Chapter 11
)	
Lehman Brothers Holdings Inc., <i>et al.</i> ,)	Case No. 08-13555 (SCC)
)	
Debtors.)	Jointly Administered
)	

**PROTECTIVE OBJECTION AND JOINDER OF HAYNES AND BOONE, LLP
CLIENTS TO THE OBJECTION OF WESTPAC BANKING CORPORATION TO
DEBTORS' MOTION TO ALLOW DISCLOSURE OF THE DERIVATIVE
QUESTIONNAIRES PURSUANT TO SECTION 107(a) OF THE BANKRUPTCY CODE**

The Haynes and Boone, LLP Clients listed on Schedule I (the "Haynes and Boone Clients"), by their counsel, Haynes and Boone, LLP ("Haynes and Boone"), file this *Protective Objection and Joinder of Haynes and Boone, LLP Clients to the Objection of Westpac Banking Corporation to Debtors' Motion to Allow Disclosure of the Derivative Questionnaires Pursuant*

to Section 107(a) of the Bankruptcy Code (the “Protective Objection and Joinder”) in response to the *Motion to Allow Disclosure of the Derivative Questionnaires Pursuant to Section 107(a) of the Bankruptcy Code* (the “Motion”) filed by Lehman Brothers Holdings Inc., as Plan Administrator on behalf of its affiliated debtors (collectively, the “Debtors”) and the Official Committee of Unsecured Creditors. In support of the Protective Objection and Joinder, Haynes and Boone respectfully states as follows:

1. On March 24, 2015, Haynes and Boone received the *Notice of Hearing on Motion to Allow Disclosure of the Derivative Questionnaires pursuant to section 107(a) of the Bankruptcy Code*. The Motion seeks authority to disclose, in response to litigation discovery requests, potential confidential and business sensitive information of the Haynes and Boone Clients provided in required derivative and guarantee questionnaires in the underlying bankruptcy case.

2. The objection deadline is March 30, 2015, at 4:00 p.m. (Eastern Time), which is four business days from Haynes and Boone’s receipt of the notice of the Motion. Given the short notice period, and the time that has elapsed since the questionnaires were filed, Haynes and Boone has not been able to consult fully with all of the Haynes and Boone Clients regarding the requested relief.

3. Therefore, out of an abundance of caution, in order to protect any confidential or business sensitive information, Haynes and Boone hereby joins in the Objection of Westpac Banking Corporation to the Motion, and incorporates the grounds set forth therein as if fully stated in this Protective Objection and Joinder.

FOR ALL THE ABOVE STATED REASONS, the Haynes and Boone Clients respectfully request that the Court (a) deny the relief requested in the Motion as proposed, and (b) grant such further relief as the Court deems just.

Dated: March 30, 2015
New York, New York

HAYNES AND BOONE, LLP

/s/ Robert D. Albergotti

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Attorney for the Clients listed on Schedule I

Schedule I

American Airlines, Inc.
BP Capital Energy Equity Fund, L.P.
BP Capital Energy Fund, L.P.
BP Cap. Energy Equity Intl. Hldgs. I, LP
BP Cap. Energy Equity Fund Master II, LP
EXCO Operating Company, LP
Hayman Capital Master Fund, L.P.
Pickens, T. Boone
Steven G. Holder Living Trust